

UNITED STATES OF AMERICA  
IN THE U.S. DISTRICT COURT  
FOR THE EASTERN DISTRICT OF MICHIGAN

BUASHKFT MUHAMMED,

Plaintiff,

v,

Case No.

JOHN DOE,

Defendant.

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COMPLAINT

NOW COMES Plaintiff, by and through his attorney, Joseph Falcone, and for his Complaint, states as follows:

1. Plaintiff is an individual with residence and doing business in Oakland County, Michigan, in the Eastern District of Michigan.
2. Defendant is an unknown person or entity, who, upon information and belief, has his principal residence and citizenship outside of the State of Michigan and/or has its principal place of business and citizenship outside of the State of Michigan.
3. This Court has jurisdiction under 28 USC 1332.
4. Plaintiff was an owner of “crypto currency” by the name of “OHM.”

5. OHM is an algorithmic stablecoin that maintains a floating market-driven price without the 1:1 dollar collateral backing.
6. OHM is issued or maintained by a website with the domain name of “Olympus.finance.”
7. Very recently, an unknown person purchased the internet domain name “Olympps.finance” from a domain name seller. The unknown person created a website under that name that looked and worked exactly like the Olympus.finance website, except crypto currency transacted on that fake website was diverted and stolen by the operator of the Olympps.finance website.
8. The Olympps.finance website was used to fool and defraud users, including Plaintiff, into thinking they were on the Olympus.finance website and to further trick those persons into inputting various pieces of secret information, such as secret passwords and other information that enabled the operators of Olympps.finance to go onto various other websites to cash in OHM crypto coin and, in effect, steal the unwary users OHM crypto units.
9. The Defendant, in establishing the Olympps.finance website was making misrepresentations that they knew were false, and intended to make those

false representations for the purpose of and with the intent to have

Plaintiff and others rely on said misrepresentations to their detriment.

10. As the result of the Defendant's fraud and misrepresentation as aforesaid,

Plaintiff did rely on the false misrepresentations set forth in the website

Olymps.finance operated by Defendant, and such reliance was to the

Plaintiff's detriment and as a result, suffered damages in an amount in

excess of \$180,000.

11. This Court should award damages against Defendant in an amount in

excess of \$180,000.

WHEREFORE, Petitioner prays that this Honorable Court enter a judgment

in Plaintiffs favor and against the Defendant in an amount in excess of \$180,000,

plus interest, costs and attorney's fees so wrongfully incurred.

/s/ Joseph Falcone November 11, 2021

Joseph Falcone (P25727)

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